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21 Attorneys for CCSD Defendants

22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 MICHELLE COX, individually, and as a
25 parent and next friend of M.C.,

26 Plaintiffs,

27 vs.

28 RYAN LEWIS, individually, and in his
29 official capacity, JORGE PALACIOS,
30 individually, and in his official capacity, and
31 CLARK COUNTY SCHOOL DISTRICT,

32 Defendants.

33 Case Number:
34 2:20-cv-01792-JCM-BNW

35 **STIPULATION AND ORDER TO**
36 **EXTEND DISPOSITIVE MOTION**
37 **DEADLINE**

38 **(FIRST REQUEST)**

39 The Parties, Plaintiffs Michelle Cox, individually, and as a parent and next friend of
40 M.C., ("Plaintiffs"), by and through their counsel of record, Jason J. Bach, Esq., of The
41 Bach Law Firm, LLC and Defendants Clark County School District ("CCSD"), Ryan Lewis
42 ("Lewis"), and Jorge Palacios ("Palacios") (collectively "CCSD Defendants"), by and
43 through their counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of
44 Marquis Aurbach, and hereby agree and jointly stipulate the following:

1 1. This request for an extension of time is not sought for an improper purpose or
2 other purpose of delay. Additionally, counsel for Defendants has had several depositions in
3 the *Lance Downes-Covington, et al. v. Las Vegas Metropolitan Police Department, et al.*,
4 United States District Court, District of Nevada, Case No. 2:20-cv-01790-CDS-DJA
5 throughout the month of August. Furthermore, in addition to her normal caseload, counsel
6 for Defendants will be participating in a jury trial in *Faye Rivera, et al. v. Las Vegas*
7 *Metropolitan Police Department, et al.*, Eighth Judicial District Court, Clark County, Case
8 No. A-17-766014-C, which is currently scheduled for a firm setting to begin on September
9 6, 2022 through September 12, 2022. This is the first request for extension of time in this
10 matter. The parties respectfully submit that the reasons set forth above constitute
11 compelling reasons for the modest extension.

12 2. The Parties further agree, the dispositive motion deadline currently set for
13 August 31, 2022 shall be extended to Tuesday, September 6, 2022.

14 3. WHEREFORE, the parties respectfully request that the Dispositive Motion
15 be extended to and including Tuesday, September 6, 2022.

16 4. WHEREFORE, Plaintiffs' counsel will have 30 days to file their response to
17 Defendants' Dispositive Motion which will be due on October 6, 2022.

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1 5. This Stipulation is being entered in good faith and not for purposes of delay.

2 IT IS SO STIPULATED.

3 Dated this 31st day of August, 2022

Dated this 31st day of August, 2022

4 THE BACH LAW FIRM, LLC

MARQUIS AURBACH

5 By: /s/ Jason J. Bach

6 Jason J. Bach, Esq.
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10 Attorney for Plaintiffs

By: /s/ Jackie V. Nichols

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ORDER

17 IT IS ORDERED that ECF No. 55 is GRANTED in part and DENIED
18 in part. It is granted to the extent the parties seek to extend the
19 dispositive motion deadline. It is denied to the extent the parties
20 seek an extended response-brief deadline. The parties must file
21 a separate stipulation seeking this relief. See LR IC 2-2(b).

22 IT IS SO ORDERED

23 DATED: 3:33 pm, September 01, 2022

24 

25 BRENDA WEKSLER
26 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 31st day of August, 2022.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach

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